

Huffman-Broadway Group, Inc.
Environmental Regulatory Permitting Services

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February 23, 2012

Dennis McClerran
Regional Administrator
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Dear Mr. McClerran:

Thank you for the opportunity last week for Bill Riley and I to brief you and your staff about our December 2011 report assessing whether mining the Pebble ore deposit in the Bristol Bay watershed would comply with Clean Water Act Section 404 regulations or result in unacceptable impacts to fish and wildlife resources. We did our best to share our collective views on these questions based on our decades of work at EPA on these very issues. We understand the difficult decisions you face, and hope our briefing provided useful and applicable information as your office completes its Bristol Bay Watershed Assessment and deliberates future actions.

During the briefing we were asked about the geographic scope of our recommended restriction on 404 discharges of Pebble deposit mine waste (including liner material) into salmon spawning and rearing habitat. We believe the restrictions on Pebble deposit mine waste should apply to such habitat throughout the Bristol Bay watershed. As you may know, our report defined the "Pebble deposit" as the proposed Pebble Project ore body as well as the much larger surrounding region of adjacent claims.

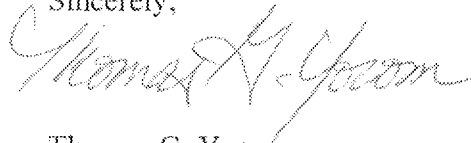
We recognize that in the past Region 10 has approved small fills, such as bridge abutments, that may have encroached into wild salmon habitat. However, large-scale discharges of potentially toxic fill material that could bury miles of wild salmon habitat have never been approved. As such, we believe such a restriction is fully consistent with Region 10's past policies and practices.

During the briefing, other good questions were raised, and we appreciated the discussion. In that spirit, we are available to respond to any questions EPA may have about our recommendations for how best to regulate discharges of mining wastes to waters of the United States within the Bristol Bay watershed. Please feel free to have your staff contact us at:

Tom Yocom: email: tommy404@sbeglobal.net; cell phone: (415) 823-1347
Bill Riley: email: miwinery@hotmail.com; cell phone: (206) 595-3643

Again, thank you for the opportunity to meet with you and your staff.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas G. Yocom".

Thomas G. Yocom
Senior Wetlands Regulatory Scientist

cc: L. Tiel Smith, Bristol Bay Native Corporation, Anchorage, AK
Shoren Brown, Trout Unlimited, Seattle, WA
Wayne Nastri, mCapitol Inc., Irvine, CA